

BEFORE THE

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Federal Communications Commission

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WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.606(b)

Table of Allotments

Analog Television Broadcast Stations
(Saranac Lake, New York)

MM Docket No. 00-____

RM-____

To: Chief, Video Services Division

PETITION FOR RULE MAKING

Channel 61 Associates, LLC ("Channel 61 Associates"), applicant for a new NTSC facility on Channel 61, Saranac Lake, New York,¹ hereby requests that the Commission initiate a rule making proceeding to substitute and allot NTSC Channel 40 for its proposed NTSC Channel 61 at Saranac Lake, New York at reference coordinates 44-09-35 N. and 74-28-34 W.²

¹Floyd L. Cox, Jr. ("Cox"), Donald J. McHone ("McHone") and WWBI-TV, Inc. ("WWBI-TV") were the three competing applicants for this facility. See FCC File Nos. BPCT-950809KF, BPCT-951106KH and BPCT-951106KE. McHone and WWBI-TV agreed to dismiss their applications and join Cox to each become one-third owners of Channel 61 Associates. The parties filed a Joint Request for Approval of Settlement Agreement with the Commission on January 30, 1998.

²On November 22, 1999, the Commission opened a filing window to allow for, among other things, applicants for new NTSC television stations on channels 60-69 to modify their proposals to specify a channel below 60, which was scheduled to close on March 17, 2000. See Public Notice, DA 99-2605 (released November 22, 1999). The Commission later extended the filing window until July 15, 2000. See Public Notice, DA 00-536 (released March 9, 2000). Thus, this rule making is timely filed.

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As set forth in the Engineering Statement, (attached hereto as Exhibit A), operation on Channel 40 appears permissible with an effective radiated power (“ERP”) of up to 155 kW, utilizing a directional antenna and an antenna height above average terrain (HAAT) of 440 meters. Thus, GCA requests the following change to the NTSC Table of Allotments:

	<u>Current</u>	<u>Proposed</u>
Saranac Lake, New York	61	40

DISCUSSION

Pursuant to the Commission’s Public Notice, DA 99-2605 (released November 22, 1999), an applicant for a new NTSC television station on channels 60-69 is eligible to modify its proposal and specify a new channel below channel 60. Channel 61 Associates’ pending application proposes operation on Channel 61 and thus, it is eligible to file the instant rule making. Operation on Channel 40 would allow Channel 61 Associates to pursue its ongoing efforts to introduce a first local television service to the Saranac Lake community.

Additionally and in accordance with the Public Notice, Channel 61 Associates’ proposed operation on Channel 40 complies with the Commission’s minimum separation requirements specified in Section 73.610 and the DTV interference criterion specified in Section 73.623(c) of the Commission’s rules. Moreover, such proposal does not adversely impact any low power television stations that have filed for Class A eligibility.

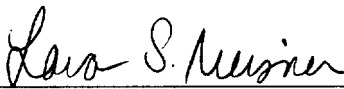
If the proposal set forth herein is adopted, Channel 61 Associates will amend its pending application to specify the facility requested herein and, if authorized, will construct and place the station into operation.

CONCLUSION

For the foregoing reasons, Channel 61 Associates, LLC respectfully requests that the Commission initiate the rule making requested herein and that it substitute NTSC Channel 40 for NTSC Channel 61 at Gainesville, Florida with an ERP of up to 155 kW and an HAAT of 440 meters.

Respectfully submitted,

**CHANNEL 61
ASSOCIATES, LLC**

By: 

David D. Oxenford

Lara S. Meisner

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Washington, D.C. 20037-1128
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Dated: July 14, 2000

EXHIBIT A

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RULE MAKING TO
MODIFY THE NTSC ALLOTMENT TABLE
CHANNEL 40
SARANAC LAKE, NEW YORK

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of Channel 61 Associates, LLC in support of a Petition for Rule Making to modify the NTSC TV allotment at Saranac Lake, New York by the proposed substitution of channel 40 for channel 61. Channel 61 Associates, LLC was formed as a result of the merger of the three (3) pending applications for channel 61 at Saranac Lake, New York.¹ It is believed that the proposal comports with the television allotment priorities² for the following reasons:

- ❑ The city of Saranac Lake, New York (1990 Population 5,377 persons) will receive its first local NTSC television transmission facility.
- ❑ The proposal will result in the provision of service to a TV gray area (1 existing TV service) containing 1,995 persons.
- ❑ The proposal is fully-spaced to all domestic NTSC stations and also complies with all other technical criteria contained in the FCC's rules applicable to NTSC stations.
- ❑ The proposal does not adversely impact any DTV allotments.
- ❑ The proposal complies with the provisions of the existing US-Canadian TV Agreement (1994).
- ❑ The proposal complies with the provisions of the pending *Letter of Understanding* concerning protection of Canadian and US DTV stations located in the border area.
- ❑ The proposal does not adversely impact any LPTV stations which filed for Class A eligibility.

¹ BPCT-950809KF, BPCT-951106KH, BPCT-951106KE.

² The television allotment priorities are: (1) provide at least one television service to all parties of the United States; (2) provide each community with at least one television broadcast station; (3) provide a choice of at least two television services to all parts of the United States; (4) provide each community with at least two television broadcast stations; and (5) any channels which remain unassigned under the foregoing priorities will be assigned to various communities depending on the size of the population of each community, the geographic location of such community, and the number of television services available to such community from television services located in other communities. See *Sixth Report and Order on Television Allocations*, 41 FCC 148, 167 (1952).

In the FCC Public Notice entitled "Mass Media Bureau Announces Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations", released on November 22, 1999 (DA 99-2605), the FCC announced a filing window opportunity for applicants with certain pending application and allotment petitions for new analog (NTSC) TV stations. Included in the list of pending requests permitted to file during this window period are pending applications for new full-service NTSC television stations on channels 60-69. Specifically, petitions for rule making seeking a new channel below channel 60 are permitted for applicants with pending applications for new full-service NTSC television stations on channels 60-69.

Currently, the pending applications are for operation on NTSC channel 61 at Saranac Lake, New York. Therefore, Channel 61 Associates, LLC is considered eligible for the filing window. This instant petition for rulemaking proposes to substitute NTSC channel 40 for the channel 61 NTSC allotment at Saranac Lake.

NTSC channel 40 can be substituted for NTSC channel 61 and allotted to Saranac Lake, New York in compliance with the principle community coverage requirements of section 73.685(a) at the following reference coordinates, Latitude 44° 09' 35", Longitude 74° 28' 34".³ Operation on channel 40 from the proposed site appears permissible with a directional antenna maximum effective radiated power (ERP) of 155 kilowatts and an HAAT of 440 meters.

It is believed that the proposed transmitter site would meet the Commission's minimum separation requirements applicable to NTSC operation on channel 40 specified in Section 73.610. The proposed channel 40 operation also complies with the FCC's interference criterion with respect to DTV allotments and authorized DTV facilities provided in Section 73.623(c). In addition, it is believed that the proposal will not adversely impact the Canadian DTV Transition Allotment Plan set forth in

the pending *Letter of Understanding* concerning protection of Canadian and US DTV stations located within the border area. The proposed NTSC channel 40 allotment also appears to comply with the pertinent provisions of the existing US-Canadian TV Agreement. It is requested that the instant proposal be coordinated with Canada. Finally, it is believed that the proposal will not adversely impact any LPTV stations which filed requests certifications of Class A eligibility. Therefore, it is proposed to modify the NTSC allotment at Saranac Lake with the following specifications:

State & City	NTSC Channel	NTSC ERP (kW)	NTSC Antenna HAAT (m)
NY, Saranac Lake	40	155 (DA)	440

It is proposed to amend the NTSC Table of Allotments, Section 73.606(b) of the Commission's Rules, as follows:

<u>City</u>	<u>Present</u>	<u>Channel No.</u>	<u>Proposed</u>
Saranac Lake, New York	61(-)		40(+)

It is proposed to allot NTSC UHF channel 40 at Latitude 44° 09' 35", Longitude 74° 28' 34". The channel 40 facility proposes operation with a "plus" (+) carrier frequency offset, an antenna radiation center height above mean sea level (RCAMSL) of 970 meters, an antenna radiation center height above average terrain of 440 meters, and a directional antenna maximum ERP of 155 kilowatts.

Figure 1 provides the technical parameters for the proposed operation, including a tabulation of the directional antenna horizontal plane radiation pattern. Figure 2 is polar graph of the horizontal plane relative field pattern for the proposed directional antenna system. It is noted that the proposed directional antenna has a maximum-to-minimum ratio of 14.85 dB, which complies with the 15 dB maximum-to-minimum ratio specified in Section 73.685(e).

³ The proposed transmitter site and RCAMSL are the same transmitter site and RCAMSL specified in each of the 3 pending applications for channel 61 at Saranac Lake, New York.

Figure 3 is a separation study toward other domestic NTSC and DTV allotments as well as current Canadian NTSC allotments based on a 50 kilometer "buffer". As indicated, the allotment reference point is fully-spaced to all other NTSC stations or allotments except towards a vacant domestic noncommercial NTSC channel 40 allotment at Berlin, New Hampshire, and Canadian co-channel allotments at Hull, Quebec and Trenton, Ontario. The vacant domestic noncommercial NTSC channel 40 allotment at Berlin was replaced by DTV channel 15 in the *Memorandum Opinion and Order on Reconsideration of the 5th and 6th Report and Orders* in MM Docket No. 87-268 (FCC 98-315). Thus, this short-spacing is eliminated.

With respect to the Canadian short-spacings, based on a conversation with a staffperson at the FCC's International Branch, only NTSC Canadian NTSC assignments contained in the Canadian DTV Transition Allotment Plan attached as Appendix 1 of the pending *Letter of Understanding* (LOU) concerning protection of Canadian and US DTV stations located within the border area are to be protected. In other words, the allotment table contained in the existing US-Canadian TV Agreement (1994) is superseded by the allotment plan attached to the LOU.⁴ Protection of the pertinent Canadian NTSC allotments contained in the LOU is discussed below.

With respect to domestic DTV allotments, the minimum distance separation requirements applicable to "new" DTV allotments contained in Section 73.623(d) provide an indication of which DTV stations have the potential of receiving interference from the proposed channel 40 NTSC operation. Interference calculations made in accordance with the procedures adopted in the FCC's *Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders* in MM Docket No. 87-268 and outlined in OET Bulletin No. 69 indicate that the proposed channel 40 operation would not cause prohibited interference to any domestic DTV allotments. Therefore, the proposed operation is in full compliance with the

⁴ It is noted that the Hull and Trenton channel 40 NTSC allotments are contained in the existing US-Canadian TV Agreement (1994) as well as the Allotment Plan attached as Appendix 1 to the LOU.

FCC's interference criterion with respect to pertinent domestic DTV allotments.⁵

Figure 4, Sheet 1, is a separation study based on the Canadian DTV transition Allotment Plan attached as Appendix 1 of the LOU. The required separations towards Canadian DTV allotments shown on Figure 4 were based on the separations applicable to NTSC Class C allotments⁶ contained in Table 4.2.10 of Appendix 3 attached to the LOU. The required separations towards Canadian NTSC allotments shown on Figure 4 were based on the separations applicable to NTSC stations operating with standard parameters contained in paragraph 3.3.2 and Table I of the existing US-Canadian TV Agreement (1994).

As indicated on Sheet 1 of Figure 4, the proposed NTSC channel 40 operation at Saranac Lake complies with the required separations towards all Canadian DTV and NTSC allotments with the exception of co-channel 40 allotments at Hull, Quebec, St-Hyacinthe, Quebec and Trenton, Ontario. However, the proposed NTSC channel 40 operation complies with the contour protection provisions of the existing US-Canadian TV Agreement towards these allotments. It is noted that Appendix 1 of the LOU does not contain carrier frequency offset information for Canadian NTSC allotments. However, based on information provided by the International Branch of the FCC, it was determined that Hull will operate with a "0" offset, Trenton will operate with a "+" offset, and St-Hyacinthe will operate with a "z") offset.

Sheet 2 of Figure 4 is a map showing the reference points for the Hull, St-Hyacinthe and Trenton channel 40 allotments and the location of their 64 dBu, F(50,50) protected service areas. The location of the protected service areas are based on the station Class contained in Appendix I attached to

⁵ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed. An Alpha based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

⁶ NTSC Class C stations operate with "standard" parameters consisting of an ERP of 1000 kW and an HAAT of 300 meters.

the LOU. It is proposed to utilize a plus ("+") offset for channel 40 at Saranac Lake. Thus, the proposed channel 40 operation at Saranac Lake will operate with an offset carrier with respect to the Hull and St-Hyacinthe allotments and the pertinent interfering contour would be the 46 dBu, F(50,10) contour. With respect to the Trenton allotment, channel 40 at Saranac Lake will operate without a non-offset carrier and the pertinent interfering contour would be the 29 dBu, F(50,10) contour. As shown, there will be no prohibited contour overlap with the Canadian allotments at Hull, St-Hyacinthe and Trenton. Therefore, the protection requirements are met with respect to all three allotments.

Figure 5 is a map which depicts the City Grade (80 dBu), Grade A (74 dBu), and Grade B (64 dBu) contours for the proposed channel 40 NTSC operation. The city limits of Saranac Lake (based on the 1990 Census data) are also shown. As indicated, all of Saranac Lake is located within the predicted City Grade contour. Therefore, the proposed channel 40 NTSC allotment will comply with the FCC's city coverage requirements.

Figure 6, Sheet 1, is a map depicting the Grade B contour for the proposed channel 40 operation at Saranac Lake. Also shown are the Grade B contours available within the proposed Grade B contour. Sheet 2 of Figure 6 tabulates the TV stations whose Grade B contours are shown on Sheet 1. The TV white (0 existing TV service) and gray (1 existing TV service) areas have been identified on Sheet 1. It has been determined that the TV white area consists of 3 square kilometers containing 0 persons and the TV gray area consists of 1,542 square kilometers containing 1,995 persons.

Figure 7 is a tabulation of all co-channel and adjacent channel LPTV stations which filed for Class A eligibility and which could be adversely impacted by the proposed channel 40 NTSC operation. Studies indicate the proposed operation on NTSC channel 40 at Saranac Lake will not adversely impact any of the co-channel or pertinent adjacent channel LPTV stations tabulated on Figure 7.

Conclusion

It is believed that channel 40 can be substituted for the current channel 61 NTSC allotment at Saranac Lake, in compliance with the domestic and international rules concerning NTSC allotment changes.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
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March 7, 2000

TECHNICAL EXHIBIT
 PREPARED IN SUPPORT OF
 PETITION FOR RULE MAKING TO
 MODIFY THE NTSC ALLOTMENT TABLE
 CHANNEL 40
 SARANAC LAKE, NEW YORK

Technical Parameters

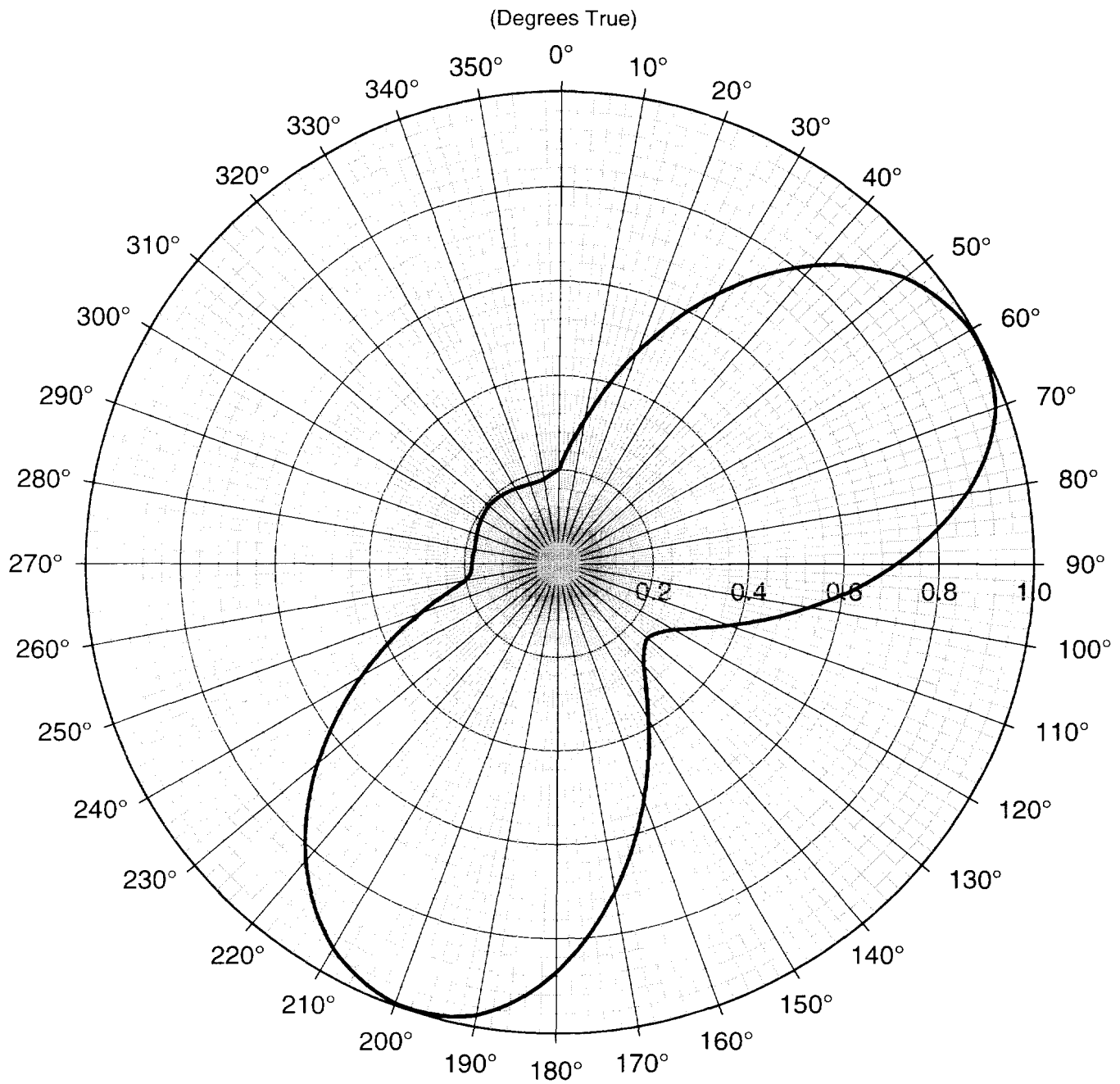
1. Facilities

<u>Call</u>	<u>City Name</u>	<u>State</u>	<u>Country</u>	<u>Channel</u>	<u>Offset</u>	<u>Facility</u>	<u>Status</u>		
NEW	SARANAC LAKE	NY	A	40	+	TV	PRM		
<u>Latitude</u>	<u>Longitude</u>	<u>File</u>	<u>Number</u>	<u>Docket</u>	<u>No.</u>	<u>Last Updated</u>	<u>Cutoff</u>		
44-09-35.0	74-28-34.0								
<u>ERP-kW</u>	<u>HAAT-m</u>	<u>MaxHAAT-m</u>	<u>RCamsl-m</u>	<u>DA</u>	<u>BT</u>	<u>Pol</u>	<u>Ref-Az</u>	<u>Ant-Make</u>	<u>Ant-Type</u>
155	440	492	970	Y	Y	H	0	AND	ATW-P4
<u>Border</u>	<u>Zone</u>	<u>E/C</u>	<u>Applicant/Licensee</u>	<u>Name</u>				<u>TV Database</u>	<u>Date</u>
C	2	C							

2. Directional Antenna Data (Orientation 0° True)

Make : AND	Model : ODD960920KY	Pattern Date	TVDA DB Date
<u>Bearing Relative</u>	<u>Bearing Relative</u>	<u>Bearing Relative</u>	<u>Bearing Relative</u>
<u>Deg-Rel</u>	<u>Field</u>	<u>Deg-Rel</u>	<u>Field</u>
.0	.202	90.0	.710
10.0	.312	100.0	.536
20.0	.479	110.0	.382
30.0	.663	120.0	.282
40.0	.828	130.0	.247
50.0	.946	140.0	.282
60.0	.997	150.0	.382
70.0	.977	160.0	.536
80.0	.872	170.0	.710
Extra Bearing(s) :			
63.0	1.000	197.0	1.000

Figure 2



DIRECTIONAL ANTENNA RADIATION PATTERN

(RELATIVE FIELD)

NEW NTSC STATION

SARANAC LAKE, NEW YORK

CH 40 155 KW (MAX-DA) 440 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

NTSC TO NTSC Separation Study

Job Title : Proposed Ch 40 Saranac Lake, NY Separation Buffer 50 km
Zone : 2 FCC TV DB Date : 12/30/99
Channel 40 (626-632 MHz) Coordinates : 44-09-35 74-28-34

Call	City	Channel	ERP(kW)	Latitude	Bear.	Dist.	Req.
Status	St	FCC File No.	Zone	HAAT(m)	Longitude	True (km)	(km)
ALLOC.	QU	-	25(o) I	0	45-19-00 73-14-00	36.9 161.93 41.93	120.0 CLEAR
ALLOC.	ON	-	26(-) I	0	44-43-00 75-31-00	307.2 103.42 8.42	95.0 CLOSE
WETK LIC	BURLINGTON VT	BLET-910613KE	*33(-) II	1350 DA 815	44-31-32 72-48-54	72.3 138.57 42.87	95.7 CLEAR
ALLOC.	QU	-	40(o) I	0	45-18-56 75-17-32	333.7 143.80 -106.20	250.0 SHORT¹
CHOTTV LIC	HULL QU	-	40(o) I	684 DA 353	45-30-11 75-51-02	324.5 184.67 -65.33	250.0 SHORT¹
ALLOC.	ON	-	40(+) I	0	44-06-00 77-35-00	269.5 248.78 -1.22	250.0 SHORT¹
ALLOC.	ON	-	40(+) I	0	44-06-00 77-35-00	269.5 248.78 -1.22	250.0 SHORT¹
WGGBTV LIC	SPRINGFIELD MA	BLCT-871117KE	40(o) I	4270 DA 322	42-14-30 72-38-57	144.6 259.73 11.13	248.6 CLOSE
WGGBTV APP	SPRINGFIELD MA	BPCT-990429KG	40(o) I	4270 DA 324	42-14-30 72-38-57	144.6 259.73 11.13	248.6 CLOSE
WICZTV LIC	BINGHAMTON NY	BLCT-900206KG	40(-) I	468 375	42-03-22 75-56-39	207.5 262.49 13.89	248.6 CLOSE
ALLOC.	NH	-	*40(-) II	0	44-28-12 71-11-00	81.3 264.97 -15.83	280.8 SHORT²
ALLOC.	ON	-	41(+) I	0	45-02-00 74-44-00	348.2 99.21 9.21	90.0 CLOSE
ALLOC.	ON	-	47(o) I	0	45-02-00 74-44-00	348.2 99.21 4.21	95.0 CLOSE
WYPX LIC	AMSTERDAM NY	BLCT-871221KG	55(o) I	5000 DA 223	42-59-05 74-10-49	169.6 132.72 12.82	119.9 CLOSE

** End of TV Separation Study for Channel 40 **

¹These Canadian assignments are contained in the existing US-Canadian TV Agreement (1994) as well as the Canadian DTV Transition Allotment Plan attached as Appendix 1 of the pending *Letter of Understanding* concerning protection of Canadian and US DTV stations located within the border area. The proposed NTSC channel 40 allotment appears to comply with the pertinent provisions of the existing US-Canadian TV Agreement. See Technical Narrative and Sheet 2 of Figure 4.

²This noncommercial vacant NTSC allotment was replaced by DTV channel 15 in the Memorandum Opinion and Order on Reconsideration of the 5th and 6th Report and Orders in MM Docket No. 87-268 (FCC 98-315).

NTSC TO DTV Separation Study

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Job Title :Proposed Ch 40 Saranac Lake, NY           Separation Buffer  50 km
Zone : 2                                           FCC DTV DB Date: 12/18/98
Channel 40 (626-632 MHz)                        Coordinates : 44-09-35  74-28-34

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Call	City	Channel	ERP(kW)	Latitude	Bear.	Dist.	Req.
Status	St	FCC File No.	Zone	HAAT(m)	Longitude	True (km)	(km)
DWNPETV	WATERTOWN	41	50	43-51-44	252.1	105.68	12.0/106.0
DTVALT	NY	II	370	75-43-40		-0.32	SHORT³

** End of DTV Separation Study for Channel 40 **

³ The proposed NTSC channel 40 allotment complies with the FCC's DTV protection requirements. See Technical Narrative.

ALLOCATION STUDY
CANADIAN DTV ALLOTMENT PLAN

Job Title : Proposed Ch. 40 Saranac Lake, NY
Sorted by Channel
Channels 25 to 55

TV/DTV Within 400.0 km
FCC TV DB Date : 12/30/99
Coordinates : 44-09-35 74-28-34

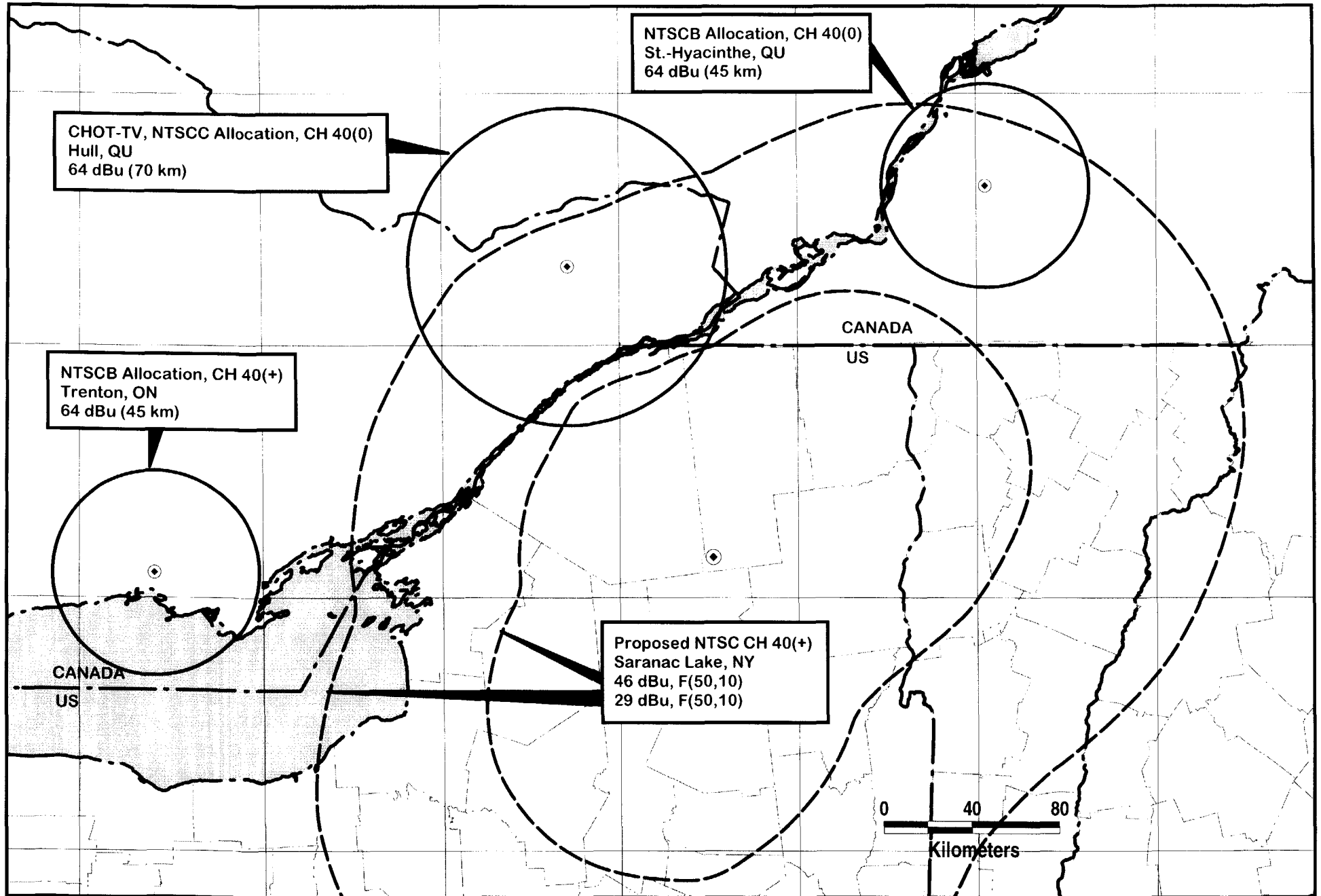
Call Status	City State	FCC File No.	Channel Zone	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	<u>Distance</u>	
							Actual (km)	Required ¹ (km)
CKWS-TV	PRESCOTT		26		44-49-54	312.40	111.77	95.0
NTSCA	ON				75-31-17		16.77	CLEAR
DTVB	CORNWALL(31)		36		45- 1-59	348.25	99.20	71.0
	ON				74-43-59		28.20	CLEAR
CHOT-TV	HULL		40		45-18-43	333.58	143.46	250.0
NTSCC	QU				75-17-31		-106.54	SHORT²
NTSCB	ST-HYACINTHE(48)		40		45-37-59	35.73	203.35	250.0
	QU				72-56-59		-46.65	SHORT²
NTSCB	TRENTON		40		44- 5-59	269.55	248.77	353.0
	ON				77-34-59		-104.23	SHORT³
CBMT-1	TROIS-RIVIERES		40		46-29-26	28.20	296.00	223.0
DTVB	QU				72-39- 0		73.0	CLEAR
CKCO-TV	HUNTSVILLE		40		45-19-44	291.71	378.55	252.0
DTVVU	ON				78-57-56		126.55	CLEAR
DTVB	CORNWALL(52)		47		45- 1-59	348.25	99.20	70.0
	ON				74-43-59		29.2	CLEAR
NTSCB	CORNWALL(21)		54		45- 1-59	348.25	99.20	95.0
	ON				74-43-59		4.20	CLOSE
DTVB	CORNWALL(69)		55		45- 1-59	348.25	99.20	53.0
	ON				74-43-59		46.20	

** End of TV Within Study **

¹Minimum distance separations towards Canadian DTV allotments based on those applicable to NTSC Class C (standard parameters) allotments contained in 4.2.10 of the pending *Letter of Understanding* concerning protection of Canadian and US DTV stations located in the border area. Minimum distance separations toward Canadian NTSC allotments based on those applicable to NTSC stations operating with standard parameters contained in paragraph 3.3.2 and Table I of the existing US-Canadian TV Agreement (1994).

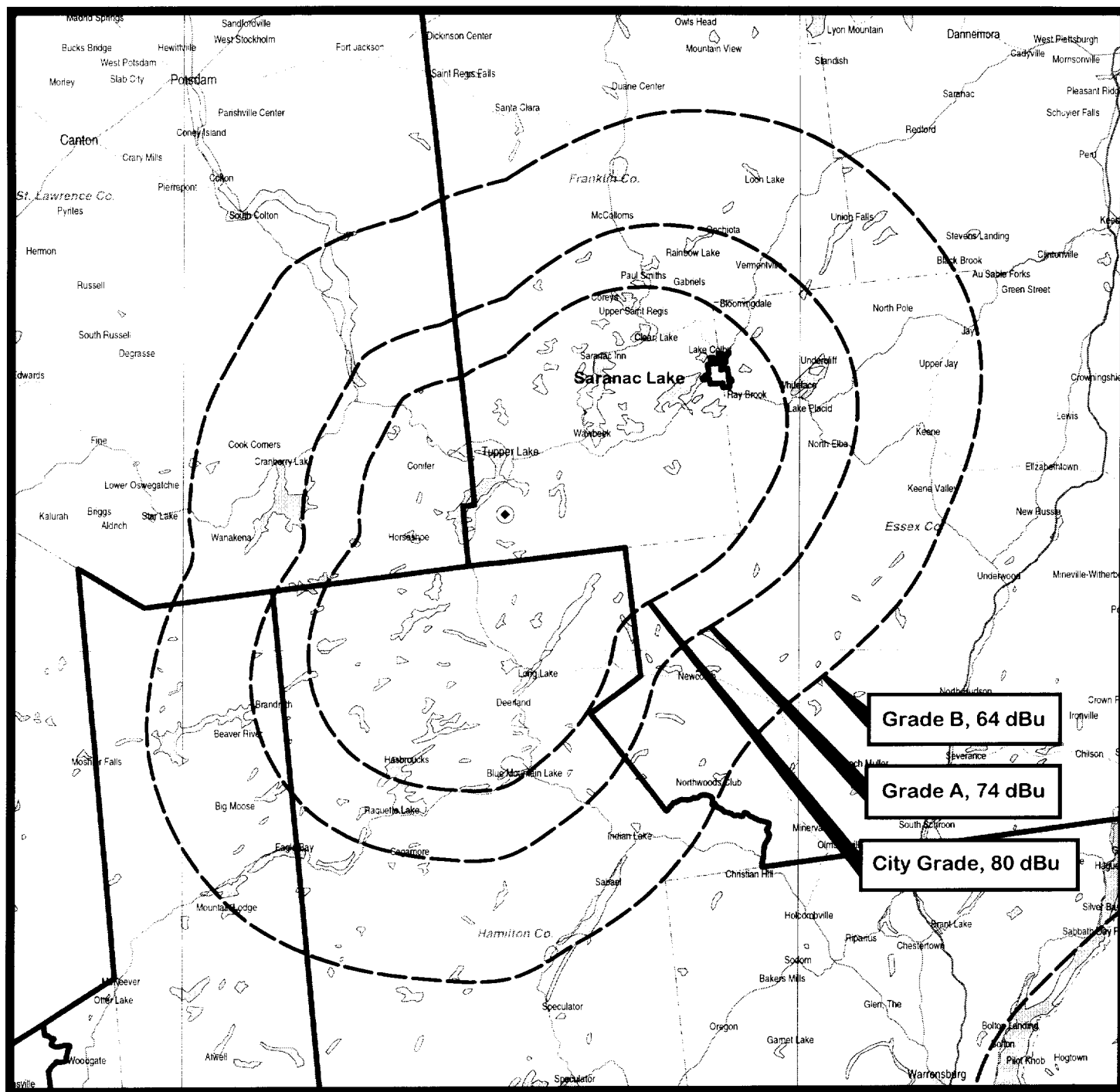
²Separation based on "offset carriers". Contour protection provided in accordance with the pertinent provisions of the existing US-Canadian TV Agreement (1994). See Technical Narrative and Sheet 2.

³Separation based on "non-offset carriers". Contour protection provided in accordance with the pertinent provisions of the existing US-Canadian TV Agreement (1994). See Technical Narrative and Sheet 2.



CANADIAN ALLOCATION STUDY
NEW NTSC TV STATION
SARANAC LAKE, NEW YORK
CH 40 155 KW (MAX-DA) 440 M
du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 5



PREDICTED COVERAGE CONTOURS
NEW NTSC TV STATION
SARANAC LAKE, NEW YORK
CH 40 155 KW (MAX-DA) 440 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

OTHER TV STATIONS PROVIDING SERVICE WITHIN THE PROPOSED GRADE B CONTOUR

Map ID	Call Letters	Location	Authorized Facilities
A	WKTV (TV)	Utica, NY	CH 2, 34.7 kW/421 m
B	WCAX-TV	Burlington, VT	Ch 3, 38 kW/835 m
C	WPTZ (TV)	North Pole, NY	Ch 5, 25.1 kW/607 m
D	WWNY-TV (CP)	Carthage, NY	Ch 7, 316 kW/221 m
E	WPBS-TV	Watertown, NY	Ch 16, 617 kW/370 m
F	WNPI-TV	Norwood, NY	Ch 18, 661 kW/243 m
G	WUTR (TV) (CP)	Utica, NY	Ch 20, 1,150 kW/244 m
H	WVNY (TV)	Burlington, VT	Ch 22, 1,000 kW/835 m
I	WETK (TV)	Burlington, VT	Ch 33, 1,350 kW/815 m
J	WFFF-TV (CP MOD)	Burlington, VT	Ch 44, 1,450 kW/840 m
K	WWTI	Watertown, NY	Ch 50, 1,000 kW/387 m
L	WCFE-TV	Plattsburgh, NY	Ch 57, 794 kW/741 m

CLASS A LPTV STATIONS
STUDIED FOR ADVERSE IMPACT

Job Title : Proposed Ch 40 Saranac Lake, NY

Sorted by Channel

Coordinates : 44-09-35 74-28-34

Call	City	Channel	ERP(kw)	Latitude	Bearing	Distance
Status	State	FCC File No.	Zone	HAAT(m)	Longitude	deg-True (km) (mile)
W25AB	WATERTOWN	25(+)	1.84 DA	43-58-55	260.9	119.33 74.16
LIC	NY	BLTTL-900510ID	99 max.	75-56-42		
Name : SMITH B/CASTING GROUP OF WATERTOWN						
WBVT-LP	BURLINGTON	39(o)	63 DA	44-21-52	79.0	125.44 77.96
LIC	VT	BLTTL-940620JB	524 max.	72-55-53		
Name : NYN, LLC						
Comment: TO BARRE, VT; CALL SIGN CHANGED FROM W39AS (04-24-98)						
W40BL	NEWPORT	40(-)	11.5 DA	44-55-27	60.5	176.74 109.84
CP MOD	VT	BMPTTL-980601MY	925 max.	72-31-34		
Name : SMC COMMUNICATIONS, INC.						
Comment: FROM CH-14, NEWPORT, VT						
W40BJ	DEWITT	40(o)	10.0 DA	43-00-25	226.0	182.98 113.72
LIC	NY	BLTTL-990125JC	172 max.	76-05-38		
Name : CRAIG L. FOX						
WBGT-LP	ROCHESTER	40(+)	10 DA	43-10-14	248.0	280.31 174.21
LIC	NY	BLTTL-971014JH	209 max.	77-40-23		
Name : DAVID A. GRANT AND MOLLY L. GRANT						
Comment: CALL SIGN CHANGED FROM W40AG EFFECTIVE 11-29-96.						
WNGX-LP	SCHENECTADY	42(o)	1.02	42-51-04	167.0	149.15 92.70
CP	NY	BPTTL-980601LN	315 max.	74-03-55		
Name : BRIAN A. LARSON						
Comment: FROM CH. 04; CALL SIGN CHANGED FROM W04DA EFF. 07-13-98.						

** End of LPTV Within Study **

CERTIFICATE OF SERVICE

I, Karleen Lamie, a secretary in the law firm of Shaw Pittman, hereby certify that on this 14th day of July, 2000, I caused to be served by hand delivery a copy of the foregoing "**Petition for Rule Making,**" on the following:

John A. Karousos, Chief
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 12th Street, SW
3-A320
Washington, DC 20554


Karleen Lamie